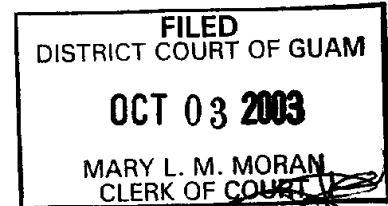


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4 414 West Soledad Avenue
5 Hagåtña, Guam USA 96910
6 Telephone: (671) 477-3637
7 Facsimile: (671) 472-1584



8 Attorneys for Plaintiff Shell Guam, Inc.

9
10 IN THE DISTRICT COURT OF GUAM

11 SHELL GUAM, INC.,)	CIVIL CASE NO. CIV03-00029
)	
12 Plaintiff/)	
13 Counterdefendant,)	
)	
14 vs.)	NON-OPPOSITION/REQUEST
)	
15 M/V PALAU MARU NO. 1,)	
)	
16 Defendant/)	
17 Counterclaimant,)	
)	
18 and)	
)	
19 RRG INTERNATIONAL, INC.,)	
)	
20 Claimant/)	
21 Plaintiff-in-Intervention.)	

22 COMES NOW, Plaintiff Shell Guam, Inc. and does not oppose the intervention by RRG
23 International, Inc..

24
25 However, as a condition to such intervention Plaintiff Shell Guam, Inc. requests that
26 Plaintiff-in-Intervention RRG International, Inc. be required to pay its share, approximately one-
27 third (1/3), of the custodial expenses incurred by Plaintiff Shell Guam, Inc.. As shown by the
28

ORIGINAL

5 attached letter from Oceaneer Enterprises, Inc. the amount incurred to the custodian through
6 September 30, 2003 is the sum of \$13,745.00. In addition, Plaintiff Shell Guam, Inc. has made a
7 deposit with the U.S. Marshal's Service in the sum of \$5,000.00. Thus, Plaintiff-In-Intervention
8 RRG International, Inc. owes Plaintiff shell Guam, Inc. the sum of \$6,248.33.

9 Dated this 3rd day of October 2003.

10
11 ZAMSKY LAW FIRM
12 Attorneys for Plaintiff Shell Guam, Inc.

13 By: 
14 STEVEN A. ZAMSKY

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26
27 Z8(004.676)\PLD\P#2043
28

OCEANEER ENTERPRISES Inc.

CAPT. JÜRGEN
UNTERBERG
MARINE SURVEYOR
MASTER MARINER

Guam Office: 1026 Cabras Highway, Suite 113, Piti, Guam 96925
Tel: Home: (671) 789-5339 Office: (671) 477-9490 Fax: (671) 477-1645 Cell: (671) 687-6535

To
Steven A. Zamsky, Atty.

9-30-03

CC. Tania Stoicovy, Shell, Guam Inc.

Following are the costs relative to keeping the vessel secure and
for maintenance and buoy rental:

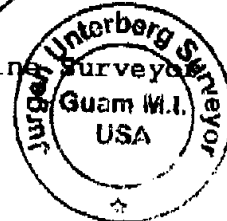
6-18-03 through 9-30-03, 14:00hrs:

Vessel:	Labor:	Expenses (buoy rental consumables etc.)
Gyoku Maru No.18	\$ 16,755.00	\$ 4,493.82
Hiro Maru No.11	\$ 16,755.00	\$ 4,493.82
Tenryo Maru No.28	\$ 16,755.00	\$ 4,493.82

8-1-03, 18:00hrs through 9-30-03, 14:00hrs

Palau Maru No.1	\$ 11,325.00	\$ 2,420.00
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Capt. J. Unterberg, Marine Surveyor
Keeper for USMS



Consultant

Services: REPAIRS OF VESSELS, DRYDOCKING, SALVAGE MASTER AND SALVAGE OPERATIONS

Classification Surveyor for: LR, KR, CCRS, and other Societies